

# Exhibit F

**From:** Natalie Wood  
**To:** McGinty, William (ATG); Andrapalliyl, Vinita B. (CIV)  
**Cc:** Heintz, Tera M. (ATG); Fraas, Lauryn (ATG); Sepe, Cristina (ATG); Hughes, Andrew (ATG); Luna, Neal (ATG); Wolf, Lucy (ATG); Allie.M.Boyd@doj.oregon.gov; James.Canaday@ag.state.mn.us; shannon.stevenson@coag.gov; Melody, Colleen M (ATG)  
**Subject:** RE: Washington v. Trump, 2:25-cv-244 (W.D. Wash.) - request for conference  
**Date:** Monday, March 31, 2025 1:03:59 PM  
**Attachments:** [image001.png](#)

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[EXTERNAL]

Good afternoon,

After reviewing Defendants' request and Plaintiffs' response, the Court declines to hold a status conference at this time because the parties have already had their Rule 26(f) conference.

Thank you!

**Natalie Wood**

Courtroom Deputy to the Honorable Judges  
Lauren King & Barbara J. Rothstein  
United States District Court  
Western District of Washington  
(206) 370-8524



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**From:** McGinty, William (ATG) <william.mcginty@atg.wa.gov>  
**Sent:** Monday, March 31, 2025 11:19 AM  
**To:** Andrapalliyl, Vinita B. (CIV) <Vinita.B.Andrapalliyl@usdoj.gov>; Natalie Wood <Natalie\_Wood@wawd.uscourts.gov>  
**Cc:** Heintz, Tera M. (ATG) <tera.heintz@atg.wa.gov>; Fraas, Lauryn (ATG) <Lauryn.Fraas@ATG.WA.GOV>; Sepe, Cristina (ATG) <cristina.sepe@atg.wa.gov>; Hughes, Andrew (ATG) <andrew.hughes@atg.wa.gov>; Luna, Neal (ATG) <neal.luna@atg.wa.gov>; Wolf, Lucy (ATG) <lucy.wolf@atg.wa.gov>; Allie.M.Boyd@doj.oregon.gov; James.Canaday@ag.state.mn.us; shannon.stevenson@coag.gov; Melody, Colleen M (ATG) <colleen.melody@atg.wa.gov>  
**Subject:** RE: Washington v. Trump, 2:25-cv-244 (W.D. Wash.) - request for conference

**CAUTION - EXTERNAL:**

Ms. Wood,

Plaintiffs do not believe a conference is necessary because the Court's orders are clear, and in any event the parties' Rule 26(f) conference has now occurred such that discovery would be proper even if the Court had not ordered expedited discovery. Moreover, Defendants' voluntary reinstatement of the grant at issue does not moot any dispute, as Defendants claim the power to terminate it again at will.

But if the Court is inclined to grant Defendants' requested conference, Plaintiffs request it be held via Zoom so that Plaintiffs may screen share examples of evidence that demonstrate the need for discovery to proceed without delay.

Sincerely,

William McGinty (he, him)  
Deputy Solicitor General  
PO Box 40100  
Olympia, WA 98504-010  
360-709-6027

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**From:** Andrapalliyal, Vinita B. (CIV) <[Vinita.B.Andrapalliyal@usdoj.gov](mailto:Vinita.B.Andrapalliyal@usdoj.gov)>  
**Sent:** Monday, March 31, 2025 11:09 AM  
**To:** [natalie\\_wood@wawd.uscourts.gov](mailto:natalie_wood@wawd.uscourts.gov)  
**Cc:** McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Andrapalliyal, Vinita B. (CIV) <[Vinita.B.Andrapalliyal@usdoj.gov](mailto:Vinita.B.Andrapalliyal@usdoj.gov)>; Heintz, Tera M. (ATG) <[tera.heintz@atg.wa.gov](mailto:tera.heintz@atg.wa.gov)>; Fraas, Lauryn (ATG) <[Lauryn.Fraas@ATG.WA.GOV](mailto:Lauryn.Fraas@ATG.WA.GOV)>; Sepe, Cristina (ATG) <[cristina.sepe@atg.wa.gov](mailto:cristina.sepe@atg.wa.gov)>; Hughes, Andrew (ATG) <[andrew.hughes@atg.wa.gov](mailto:andrew.hughes@atg.wa.gov)>; Luna, Neal (ATG) <[neal.luna@atg.wa.gov](mailto:neal.luna@atg.wa.gov)>; Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; [Allie.M.Boyd@doj.oregon.gov](mailto>Allie.M.Boyd@doj.oregon.gov); [James.Canaday@ag.state.mn.us](mailto:James.Canaday@ag.state.mn.us); [shannon.stevenson@coag.gov](mailto:shannon.stevenson@coag.gov); McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Melody, Colleen M (ATG) <[colleen.melody@atg.wa.gov](mailto:colleen.melody@atg.wa.gov)>  
**Subject:** Washington v. Trump, 2:25-cv-244 (W.D. Wash.) - request for conference

[EXTERNAL]

Dear Deputy Wood,

Defendants write to follow up on the voicemails the parties left for you earlier today. Per your instructions, Defendants are putting their request for a conference with the Court in email and copying Plaintiffs' counsel.

Defendants request a conference with the Court regarding a time-sensitive discovery dispute between the parties, in accordance with section VII of Judge King's standing order. In denying Plaintiffs' motion for contempt, Judge King had authorized expedited discovery into the circumstances of the NIH grant termination at issue in Plaintiffs' motion. *See* Order, ECF No. 258. Plaintiffs served requests for production and Rule 45 subpoenas and

noticed multiple depositions, including two depositions scheduled for Thursday and Friday of this week.

Late last week, NIH reinstated the grant. *See* Defs.' Notice, ECF No. 267. Defendants believe there is no longer good cause for the expedited discovery to proceed and that the expedited discovery requests have been mooted.

Defendants request a conference with the court at its earliest convenience, if possible by tomorrow, to resolve the issue of whether Plaintiffs' expedited discovery may proceed, including as to the depositions currently noticed for this week.

Thank you,

Vinita Andrapalliyal  
Senior Counsel  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
202-305-0845

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.